

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

GREAT BOWERY INC d/b/a
TRUNK ARCHIVE,

Plaintiff,

v.

CONSEQUENCE SOUND LLC,
CONSEQUENCE MEDIA
GROUP INC.; and DOES 1
through 10 inclusive

Defendant.

Case No. **9:23-cv-80488**

**DECLARATION OF KATRIN
KOSZTA**

DECLARATION OF KATRIN KOSZTA

I, Katrin Koszta, declare as follows:

1. I am the Global Brand Director for Great Bowery Inc d/b/a Trunk Archive (“Trunk Archive”). I am over the age of 18 years old. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify thereto.

2. Trunk Archive is a full-service photography licensing agency representing some of the most prominent photographers and iconic images in the world.

3. One of Trunk Archive’s most prominent photographers is Annie Leibovitz.

4. On or about November 12, 2014, Trunk Archive entered into an agreement (“Artist Agreement”) with photographer Annie Leibovitz which granted Trunk Archive the exclusive worldwide representation to license Ms. Leibovitz’ photographs.

5. After Ms. Leibovitz’ Episode VII Photographs were published in the 2015 Vanity Fair Article, Ms. Leibovitz provided the Episode VII Photographs to Trunk Archive under the terms of the Artist Agreement so that Trunk Archive could be the exclusive licensor of the Episode VII Photographs for any other publications that wished to license them.

6. After Ms. Leibovitz’ Episode VIII Photographs were published in the 2017 Vanity Fair Article, Ms. Leibovitz provided the Episode VIII Photographs to Trunk Archive under the terms of the Artist Agreement so that Trunk Archive could be the exclusive licensor of the Episode VIII Photographs for any other publications that wished to license them.

7. After Ms. Leibovitz’ Episode IX Photographs were published in the 2019 Vanity Fair Article, Ms. Leibovitz provided the Episode IX Photographs to Trunk Archive under the terms of the Artist Agreement so that Trunk Archive could be the exclusive licensor of the Episode IX Photographs for any other publications that wished to license them.

8. On June 8, 2022, Trunk Archive discovered Ms. Leibovitz’ Star Wars Photographs on Defendants’ website www.consequence.net.

9. Trunk Archive did not authorize Defendants to use the Star Wars Photographs in any manner.

I declare under penalty of perjury that the foregoing is true and correct under the laws of the United States of America.

Executed this May 9, 2024 at Munich, Germany


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Katrin Koszta